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LETTER AND COMMENTS FROM RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT REGARDING DRAFT FINAL SAMPLING AND ANALYSIS PLAN REMEDIAL  
INVESTIGATION WORK PLAN CARR POINT SHOOTING RANGE NS NEWPORT RI

9/27/2013

RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

**From:** Pamela Crump [<mailto:pamela.crump@DEM.RI.GOV>]  
**Sent:** Friday, September 27, 2013 2:37 PM  
**To:** Maritza Montegross  
**Cc:** Darlene Ward; Cannon, Melissa; Kauffman, Mark; Lombardo, Ginny; Gary Jablonski  
**Subject:** RE: Draft Final SAP - RI WP for Carr Point Shooting Range

Maritza,

RIDEM reviewed the Draft Final SAP for MRP Site 1 (OU9) – Former Carr Point Shooting Range at Naval Station Newport, RI. RIDEM does not have any further specific comments on the details of the Draft Final SAP. However, please see below two general comments regarding the issues discussed during the RPM meeting last week.

RIDEM's General Comments on the Draft Final SAP for MRP Site 1:

1. As discussed during the RPM meeting on September 19, 2013, RIDEM discovered figures indicating that pole-mounted transformers previously containing PCBs were located on MRP Site 1 and IR Site 22. Samples taken in the vicinity of the poles on IR Site 22 have detected PCBs in soil exceeding criteria. The Navy agreed to add additional sample locations on IR Site 22 to determine the extent/source of PCB contamination; however, the Navy did not agree to sample for PCBs on MRP Site 1. After discussing this issue with EPA, the regulators agree that Navy must investigate all potential releases of hazardous substances within the site. However, EPA pointed out that the boundaries between MRP Site 1 and IR Site 22 have never been made clear; therefore, the investigation of all five pole-mounted transformers may be included as part of the IR Site 22 investigation. Please state in this SAP that samples will be included for PCBs adjacent to the three poles located on MRP Site 1 as part of the IR Site 22 SAP, or revise this SAP to include sampling for PCBs adjacent to the three poles located on this Site.
2. Also discussed during the RPM meeting on September 19, 2013 is the submarine power line that extends across MRP Site 1. As indicated by Navy personnel on the base, this power line is a potential source of PCBs and lead. Please indicate if this power line is active or has been decommissioned and provide documentation to support that the cable would not be a source of hazardous constituents. Based on this information, the regulators will determine whether or not this is a source of potential contamination that should be investigated as part of the RI.

Please contact me if you have any questions regarding this email.

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